

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel., W. A.  
DREW EDMONDSON, in his official capacity  
as ATTORNEY GENERAL OF THE STATE  
OF OKLAHOMA, and OKLAHOMA  
SECRETARY OF THE ENVIRONMENT C.  
MILES TOLBERT, in his capacity as the  
TRUSTEE FOR THE NATURAL  
RESOURCES FOR THE STATE OF  
OKLAHOMA,

Plaintiffs,

vs.

Case No. 05-CV-0329 GKF-SAJ

TYSON FOODS, INC.; TYSON POULTRY,  
INC.; TYSON CHICKEN, INC.; COBB-  
VANTRESS, INC.; AVIAGEN, INC.; CAL-  
MAINE FOODS, INC.; CAL-MAINE FARMS,  
INC.; CARGIL, INC.; CARGILL TURKEY  
PRODUCTION, LLC; GEORGE'S, INC.;  
GEORGE'S FARMS, INC.; PETERSON  
FARMS, INC.; SIMMONS FOODS, INC.; and  
WILLOW BROOK FOODS, INC.,

Defendants.

**MOTION BY WILLOW BROOK FOODS, INC.'S COUNSEL  
TO ADMIT CO-COUNSEL *PRO HAC VICE***

COMES NOW R. Thomas Lay, counsel of record for Defendant, Willow Brook Foods, Inc., and pursuant to LCvR 83.3(j) hereby moves for the admission *pro hac vice* of Missouri attorney David Gregory Brown, who will serve as co-counsel for the aforementioned Defendant if so admitted.


If the motion is granted by the Court, the undersigned R. Thomas Lay and his law firm will

continue to serve as counsel for the aforementioned Defendant in the instant action.

Submitted simultaneously with the filing of this motion is tender of the required \$75.00 fee to the Clerk of this Court. In support of this motion, an Application for Admission of Attorney *Pro Hac Vice* has been attached and marked as Exhibit "A."

The granting of this motion and admission of David Gregory Brown to serve as co-counsel for the aforementioned Defendant will cause no delay in this action and will not cause any opposing party to suffer prejudice or hardship. Movant believes that David Gregory Brown is eligible for admission to the Bar of this Court, and Movant respectfully requests that the Court exercise its discretion to admit David Gregory Brown *pro hac vice*.

Respectfully submitted:



R. Thomas Lay, OBA #5297  
KERR, IRVINE, RHODES & ABLES  
201 Robert S. Kerr Avenue, Suite 600  
Oklahoma City, OK 73102

AND

Jennifer S. Griffin, MBA #44406  
(admitted *Pro Hac Vice*)  
LATHROP & GAGE, L.C.  
314 East High Street  
Jefferson City, MO 65101  
Telephone: (573) 893-4336  
Telecopier: (573) 893-5398

ATTORNEYS FOR DEFENDANT  
WILLOW BROOK FOODS, INC.

**CERTIFICATE OF SERVICE**

I certify that on the 26th day of July, 2007, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of

Electronic Filing to the following ECF registrants:

W. A. Drew Edmondson, Attorney General	<a href="mailto:drew_edmondson@oag.state.ok.us">drew_edmondson@oag.state.ok.us</a>
Kelly Hunter Burch, Assistant Attorney General	<a href="mailto:kelly_burch@oag.state.ok.us">kelly_burch@oag.state.ok.us</a>
J. Trevor Hammons, Assistant Attorney General	<a href="mailto:trevor_hammons@oag.state.ok.us">trevor_hammons@oag.state.ok.us</a>
Robert D. Singletary	<a href="mailto:Robert_singletary@oag.state.ok.us">Robert_singletary@oag.state.ok.us</a>

Douglas Allen Wilson	<a href="mailto:doug_wilson@riggsabney.com">doug_wilson@riggsabney.com</a>
Melvin David Riggs	<a href="mailto:driggs@riggsabney.com">driggs@riggsabney.com</a>
Richard T. Garren	<a href="mailto:rgarren@riggsabney.com">rgarren@riggsabney.com</a>
Sharon K. Weaver	<a href="mailto:sweaver@riggsabney.com">sweaver@riggsabney.com</a>
Robert Allen Nance	<a href="mailto:rnance@riggsabney.com">rnance@riggsabney.com</a>
Dorothy Sharon Gentry	<a href="mailto:sgentry@riggsabney.com">sgentry@riggsabney.com</a>
Riggs Abney Neal Turpen Orbison & Lewis	

J. Randall Miller	<a href="mailto:rmiller@mkblaw.net">rmiller@mkblaw.net</a>
Louis W. Bullock	<a href="mailto:lbullock@mkblaw.net">lbullock@mkblaw.net</a>
Miller Keffer & Bullock	

David P. Page	<a href="mailto:dpage@edbelllaw.com">dpage@edbelllaw.com</a>
Bell Legal Group	

William H. Narwold	<a href="mailto:bnarwold@motleyrice.com">bnarwold@motleyrice.com</a>
Elizabeth C. Ward	<a href="mailto:lward@motleyrice.com">lward@motleyrice.com</a>
Frederick C. Baker	<a href="mailto:fbaker@motleyrice.com">fbaker@motleyrice.com</a>
Lee M. Heath	<a href="mailto:lheath@motleyrice.com">lheath@motleyrice.com</a>
Elizabeth Claire Xidis	<a href="mailto:cxidis@motleyrice.com">cxidis@motleyrice.com</a>
Motley Rice	

**COUNSEL FOR PLAINTIFFS**

Stephen L. Jantzen	<a href="mailto:sjantzen@ryanwhaley.com">sjantzen@ryanwhaley.com</a>
Patrick M. Ryan	<a href="mailto:pryan@ryanwhaley.com">pryan@ryanwhaley.com</a>
Paula M. Buchwald	<a href="mailto:pbuchwald@ryanwhaley.com">pbuchwald@ryanwhaley.com</a>
Ryan, Whaley & Coldiron, P.C.	

Mark D. Hopson	<a href="mailto:mhopson@sidley.com">mhopson@sidley.com</a>
Jay Thomas Jorgensen	<a href="mailto:jjorgensen@sidley.com">jjorgensen@sidley.com</a>
Timothy K. Webster	<a href="mailto:twebster@sidley.com">twebster@sidley.com</a>
Sidley Austin LLP	

Robert W. George	<a href="mailto:robert.george@kutakrock.com">robert.george@kutakrock.com</a>
Michael R. Bond	<a href="mailto:michael.bond@kutakrock.com">michael.bond@kutakrock.com</a>
Erin W. Thompson	<a href="mailto:erin.thompson@kutakrock.com">erin.thompson@kutakrock.com</a>
Kutack Rock LLP	

**COUNSEL FOR TYSON FOODS, INC., TYSON POULTRY, INC., TYSON CHICKEN,**

**INC.; AND COBB-VANTRESS, INC.**

Robert P. Redemann	<a href="mailto:rredemann@pmrlaw.net">rredemann@pmrlaw.net</a>
Lawrence W. Zeringue	<a href="mailto:lzingue@pmrlaw.net">lzingue@pmrlaw.net</a>
David C. Senger	<a href="mailto:dsenger@pmrlaw.net">dsenger@pmrlaw.net</a>
Perrine, McGivern, Redemann, Reid, Berry & Taylor, PLLC	

Robert E. Sanders	<a href="mailto:rsanders@youngwilliams.com">rsanders@youngwilliams.com</a>
E. Stephen Williams	<a href="mailto:steve.williams@youngwilliams.com">steve.williams@youngwilliams.com</a>
Young Williams P.A.	

**COUNSEL FOR CAL-MAINE FOODS, INC. AND CAL-MAINE FARMS, INC.**

George W. Owens	<a href="mailto:gwo@owenslawfirmmpc.com">gwo@owenslawfirmmpc.com</a>
Randall E. Rose	<a href="mailto:rer@owenslawfirmmpc.com">rer@owenslawfirmmpc.com</a>
The Owens Law Firm, P.C.	

James M. Graves	<a href="mailto:jgraves@bassettlawfirm.com">jgraves@bassettlawfirm.com</a>
Gary V. Weeks	
Bassett Law Firm	

**COUNSEL FOR GEORGE'S, INC. AND GEORGE'S FARMS, INC.**

John R. Elrod	<a href="mailto:jelrod@cwlaw.com">jelrod@cwlaw.com</a>
Vicki Bronson	<a href="mailto:vbronson@cwlaw.com">vbronson@cwlaw.com</a>
Bruce W. Freeman	<a href="mailto:bfreeman@cwlaw.com">bfreeman@cwlaw.com</a>
Conner & Winters, LLLP	

**COUNSEL FOR SIMMONS FOODS, INC.**

John H. Tucker	<a href="mailto:jtuckercourts@rhodesokla.com">jtuckercourts@rhodesokla.com</a>
Colin H. Tucker	<a href="mailto:ctucker@rhodesokla.com">ctucker@rhodesokla.com</a>
Theresa Noble Hill	<a href="mailto:thillcourts@rhodesokla.com">thillcourts@rhodesokla.com</a>
Rhodes, Hieronymus, Jones, Tucker & Gable	

Terry W. West	<a href="mailto:terry@thewestlawfirm.com">terry@thewestlawfirm.com</a>
The West Law Firm	

Delmar R. Ehrich	<a href="mailto:dehrich@faegre.com">dehrich@faegre.com</a>
Bruce Jones	<a href="mailto:bjones@faegre.com">bjones@faegre.com</a>
Krisann Kleibacker Lee	<a href="mailto:kklee@faegre.com">kklee@faegre.com</a>
Dora D. Mann	<a href="mailto:dmann@faegre.com">dmann@faegre.com</a>
Faegre & Benson, L.L.P.	

**COUNSEL FOR CARGILL, INC. AND CARGILL TURKEY PRODUCTION, LLC**

A. Scott McDaniel	<a href="mailto:smcdaniel@mcdaniel-lawfirm.com">smcdaniel@mcdaniel-lawfirm.com</a>
Nicole M. Longwell	<a href="mailto:nlongwell@mcdaniel-lawfirm.com">nlongwell@mcdaniel-lawfirm.com</a>
Philip D. Hixon	<a href="mailto:phixon@mcdaniel-lawfirm.com">phixon@mcdaniel-lawfirm.com</a>

McDaniel Law Firm

Sherry P. Bartley [sbartley@mwsgw.com](mailto:sbartley@mwsgw.com)  
Mitchell Williams Selig Gates & Woodyard  
**COUNSEL FOR PETERSON FARMS, INC.**

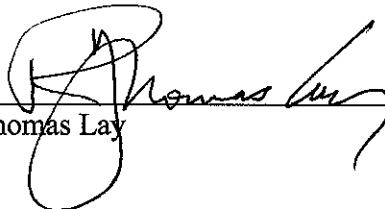
Michael D. Graves [mgraves@hallestill.com](mailto:mgraves@hallestill.com)  
Dale Kenyon Williams, Jr. [kwilliams@hallestill.com](mailto:kwilliams@hallestill.com)  
**COUNSEL FOR CERTAIN POULTRY GROWERS**

Charles Livingston Moulton [Charles.Moulton@arkansasag.gov](mailto:Charles.Moulton@arkansasag.gov)  
Arkansas Natural Resources Commission

I also hereby certify that I served the attached documents by United States Postal Service,  
proper postage paid, on the following who are not registered participants of the ECF System:

C. Miles Tolbert  
Secretary of the Environment  
State of Oklahoma  
3800 North Classen  
Oklahoma City, OK 73118  
**COUNSEL FOR PLAINTIFFS**

Thomas C. Green  
Sidley Austin Brown & Wood LLP  
1501 K Street NW  
Washington, DC 20005  
**COUNSEL FOR TYSON FOODS, INC., TYSON  
POULTRY, INC., TYSON CHICKEN, INC.; AND COBB-  
VANTRESS, INC.**

  
R. Thomas Lay